

ATTACHMENT 1

COMPLIANCE AGREEMENT
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

IN THE MATTER OF)	
)	
NPDES PERMIT NUMBER CO-0001333)	
)	FFCA-CWA-90-1
DEPARTMENT OF ENERGY)	NPDES FEDERAL FACILITY
ROCKY FLATS PLANT)	COMPLIANCE AGREEMENT
GOLDEN, COLORADO)	
)	
PROCEEDINGS UNDER EXECUTIVE)	
ORDER 12088, 43 FR 47707)	

The United States Environmental Protection Agency (EPA), Region VIII, and the United States Department of Energy (DOE), Rocky Flats Office (formerly the Rocky Flats Area Office), are parties to this NPDES Federal Facility Compliance Agreement (the Agreement) entered into pursuant to Executive Order 12088, 43 Fed. Reg. 47707 (1978). The Office of Management and Budget and the Department of Justice will take cognizance of this Agreement relative to their respective duties to assure compliance with the environmental laws under Executive Order 12088 and the Clean Water Act (the "Act"), 33 U.S.C. §§ 1251, et seq.

Executive Order 12088 was promulgated to insure Federal compliance with applicable pollution control standards. This Agreement contains a "plan", as described in Section 1-601 of Executive Order 12088, to achieve and maintain compliance with applicable water pollution control standards for the Rocky Flats Plant ("RFP").

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

ADMIN RECORD

STATEMENT OF FACTS

The following statement of facts and conclusions of law are considered by EPA to be the basis for this Agreement. Nothing in this Agreement shall be considered an admission by any party with respect to any unrelated claims by a party or with respect to any claims or actions by persons not a party to this Agreement, except in an action to enforce the terms of this Agreement.

1. EPA issued NPDES Permit Number CO-0001333 to DOE on November 26, 1984, authorizing wastewater discharges from the RFP. The permit set forth, inter alia, general and specific conditions, including effluent limits and monitoring requirements for each discharge point. The permit requires that there "be no discharge from outfall 001 except when weather conditions (precipitation, snow melt, and/or extreme low temperatures) result in flow into Pond B-3 greater than can be handled by temporary storage in Pond B-3 and spray irrigation done in accordance with good engineering practices with the existing facilities."

2. Discharge Monitoring Reports ("DMRs") submitted by DOE for the months of February 1988 through May 1988 indicate that effluent limits for outfall 001 were exceeded. Attachment A, appended and incorporated by this reference, describes these permit violations.

3. On August 9, 1988, EPA issued a Notice of Violation to DOE for the violations described in paragraph 2, requiring DOE to submit, on or before September 9, 1988, either:

- a. written certification that the violations have been corrected and compliance can be maintained; or
- b. a remedial action plan and schedule containing:
 1. a description of any noncompliance situation;
 2. identification of corrective actions to be taken including estimated costs;
 3. a schedule for obtaining the funds required to implement corrective actions;
 4. periodic progress reports; and
 5. projected completion date.

4. On September 12, 1988, DOE responded by describing the activities it had undertaken, including a schedule for the installation of dechlorination facilities and for evaluating the sludge handling facilities. EPA determined that this response was inadequate to address the remedial action plan requirements, and that DOE did not certify compliance with its permit.

5. By letter of February 10, 1989, DOE provided EPA a progress report detailing the current status of the activities it had undertaken to address the compliance problems outlined in the August 9, 1988 Notice of Violation. In addition, DOE requested that the NPDES compliance discharge point (i.e., outfall 001) be changed from the B-3 Pond to the Sewage Treatment Plant (STP) in order to more accurately reflect the Biological Oxygen Demand (BOD) levels being measured. In subsequent

telephone conversations between EPA and DOE, it was agreed that effluent monitoring would occur at both points and that compliance would be determined at the sewage treatment plant.

6. By telephone on March 1, 1989, DOE reported a discharge of a chromic acid (a hazardous substance) into its treatment facility that discharges through outfall 001. The event began February 22, 1989, and ended February 28, 1989. During this time, the effluent from the sewage treatment plant was applied by spray irrigation which resulted in run-off to the B-5 and C-2 ponds. Data subsequently supplied by DOE indicated elevated levels in the pond waters. The permit authorizes Pond B-5 discharges through outfall 006 and Pond C-2 discharges through outfall 007. At the request of DOE, EPA, by letter of April 12, 1989, granted one-time permission to DOE to bypass outfall 006 and discharge the contents of pond B-5 to Upper Church Ditch. The permission to bypass expired on May 26, 1989.

7. On March 16, 1989, EPA met with representatives of DOE and Rockwell to discuss the requested permit changes, permit violations, and the chromic acid event. In that meeting, all parties agreed that a formal NPDES Federal Facility Compliance Agreement would be the appropriate means to address the issues. On April 10, 1989, EPA issued a proposed Compliance Agreement to DOE for the RFP.

~~8. On June 27, 1989, EPA and DOE met to revise the proposed~~
NPDES Federal Facility Compliance Agreement for the RFP, NPDES

Permit No. CO-0001333. On July 18, 1989, a revised Agreement was sent by EPA to DOE. DOE did not execute this revised Compliance Agreement.

NOW, THEREFORE IT IS AGREED THAT:

I. EFFLUENT LIMITATIONS

A. Beginning no later than July 16, 1990, all effluent limitations for outfall 001, except total residual chlorine and nitrates, shall apply at the point of discharge from the STP, instead of at the discharge from Pond B-3. The limits for BOD5 shall be replaced with limits for carbonaceous BOD5 (CBOD5) with the same numerical limits. These limitations shall apply at all times, even if the effluent is spray irrigated. The limitations for total residual chlorine (TRC) and nitrates shall apply to the discharge from Pond B-3 and Pond B-5.

B. Beginning no later than July 16, 1990, the discharge from outfalls 005, 006 and 007 shall not exceed 50 ug/l total chromium in any sample.

C. Beginning no later than July 16, 1990, good engineering practice for spray irrigation shall be conducted in a manner to prevent surface water runoff from the site of application; such irrigation shall not occur during freezing conditions or when the ground surface is unable to absorb the application.

II. EFFLUENT MONITORING

A. OUTFALL 001

1. Beginning no later than June 30, 1990, the effluent from the STP shall be monitored for all of the parameters listed for outfall 001 on page 6 of the permit. The monitoring frequency for CBOD5, total suspended solids, and fecal coliform bacteria shall be at least two times per week. The frequency for the other parameters shall be the same as given on page 6 of the permit. Composite samples shall be collected for all parameters except for pH, fecal coliform, TRC, and oil and grease.

2. Beginning no later than June 30, 1990, the effluent from the STP shall be monitored for volatiles per Table II of Appendix D, 40 C.F.R. 122, and metals contained in the Hazardous Substances List (HSL) per 40 C.F.R. §§302.4. The monitoring frequency shall be monthly and the sample type shall be composite for the HSL metals and grab for volatiles.

3. Beginning no later than June 30, 1990, in addition to the monitoring at the STP, authorized discharges from Pond B-3 shall be monitored during all discharge events for CBOD5, BOD5, total suspended solids, total residual chlorine and nitrate. Either grab samples or composite samples may be collected. Samples of the discharge from Pond B-3 shall be collected after 10:00 a.m. (Note: This is to provide an opportunity for some stirring of sediments to occur within the pond).

B. WHOLE EFFLUENT TOXICITY

1. By June 30, 1990, DOE shall analyze final effluent samples from the STP for any A-4, B-5, and C-2 pond discharges acute toxicity. Sampling shall be monthly for six consecutive months and quarterly thereafter until the date that the renewal NPDES permit becomes effective. The sample type shall be a flow proportioned composite.

2. DOE shall conduct acute 48-hour replacement static tests using *Ceriodaphnia* sp. and acute 96-hour replacement static tests using fathead minnows (*Pimephales promelas*) five days (plus or minus two days) of age.

3. The acute replacement static toxicity tests shall be conducted in conformity with procedures outlined in the latest edition of "Methods for Measuring the Acute Toxicity of Effluent to Freshwater and Marine Organisms", EPA/600/4-85/013 (Revised March 1985) and the "Region VIII EPA NPDES Acute Test Conditions - Static Renewal Whole Effluent Toxicity".

Procedures may be supplemented and, in case of conflict, shall be superceded by EPA Region VIII procedures.

III. COMPLIANCE PLAN

A. DOE shall prepare a compliance plan (CP) describing

those actions necessary to maintain compliance with the terms and conditions of NPDES Permit Number CO-0001333, pursuant to Section 1-601 of Executive Order 12088. The compliance plan is to be submitted to EPA no later than July 30, 1990 and provide, at a minimum, the following:

1. a plan to conduct both a complete diagnostic evaluation of the STP in relation to effluent noncompliance issues and to identify the performance limiting factors for the appropriate facilities within the STP in relation to effluent noncompliance issues;

2. identification of action to be taken in response to 1, above. The actions to be taken will include, at a minimum, the following:

- a. upgrades to the STP instrumentation (i.e. for effluents and automated chlorination),
- b. upgrades to the STP sludge drying beds, and
- c. increased tankage for both STP influents and effluents;

3. a schedule for implementing the required actions; and

4. periodic progress reports per V, c of this Agreement.

B. No later than September 30, 1990, DOE shall submit a plan and implementation schedule, addressing, as necessary, the findings of the "Report of the Chromic Acid Incident

Investigation at Rocky Flats - February 22, 1989, specifically in Sections 5.4 (Judgment of Needs) and 5.5 (Other Areas of

Concern).

IV. SLUDGE TREATMENT, STORAGE, AND DISPOSAL

A. DOE shall provide for proper treatment, storage, and disposal of all sludges produced by its wastewater treatment system and comply with all applicable local, state, and federal regulations and standards concerning sludge disposal.

B. DOE shall provide verification of the construction of all sludge drying beds, including construction plans and specifications.

C. Due to the history of usage of the unlined beds, a groundwater monitoring plan, including an implementation schedule, shall be submitted to EPA for review and approval no later than July 16, 1990. Upon written approval of the plan by EPA, DOE shall commence implementation of the plan.

V. REPORTING REQUIREMENTS

A. EFFLUENT MONITORING

All data collected pursuant to Section II shall be submitted with the Discharge Monitoring Report (DMR) for that month unless instructed specifically below to do otherwise.

B. WHOLE EFFLUENT TOXICITY

1. Monthly acute static replacement test results shall be submitted with the DMR for that month.

2. Upon the initiation of quarterly sampling, the test results shall be submitted with the DMR for the last month of the calendar quarter per the following table:

Quarter	Reporting Due Dates
January-March	April 28
April-June	July 28

July-September
October-December

October 28
January 28

The format for the report shall be consistent with the June 28, 1988 Region VIII Guidance for Acute Whole Effluent Reporting, or its latest revision, and shall include all chemical and physical data as specified for the test.

C. PROGRESS REPORTS

1. DOE shall submit quarterly progress reports with the DMR for the last month of the calendar quarter on the actions taken in response to Section III and IV of this Order directly to EPA Region VIII, with an information copy to the Colorado Department of Health (CDH), pursuant to the following schedule:

Provide Progress
Status (as of)

Transmittal of Progress
Report no later than

July 1, 1990

July 15, 1990

October 1, 1990

October 15, 1990

January 1, 1991

January 15, 1991

April 1, 1991

April 15, 1991

(Note: Progress reports shall continue to be submitted at quarterly intervals until superseded by the renewed NPDES permit).

2. The progress reports shall indicate compliance or noncompliance with the plans described in Section III and IV of this Agreement. In the event of noncompliance, the report shall include the cause of noncompliance and any remedial actions taken. If delay is anticipated in meeting any schedule date, DOE shall immediately notify EPA, Region VIII, in writing of the anticipated delay, and include the following information:

a. the precise cause of the delay;

b. the actions taken or to be taken to prevent or minimize the delay; and

c. the timetable by which the measures shall be implemented.

3. All reports shall be sent to:

Compliance Branch Chief, 8WM-C
Water Management Division
EPA, Region VIII
999 18th Street, Suite 500
Denver, Colorado 80202-2405

VI. GENERAL PROVISIONS

A. This Compliance Agreement does not constitute a waiver or modification (except as specifically described herein) of the terms and conditions of NPDES Permit No. CO-0001333, which terms and conditions remain in full force and effect.

B. DOE has provided written notice to EPA no later than May 15, 1990, identifying the management and operating contractor of the RFP.

C. The terms and conditions of NPDES Permit No. CO-0001333, and of this Compliance Agreement, shall apply to and be binding upon DOE and the management and operating contractor ("operator") of the RFP. DOE shall give written notice of this Compliance Agreement to the operator of the RFP and notify EPA that such notice has been given. DOE shall provide written notice to EPA at least thirty (30) days prior to any change of operator at the RFP.

D. DOE shall give written notice of this Compliance Agreement to any successor agency or operator at least thirty (30) days prior to a change at the RFP; shall simultaneously notify EPA that such notice has been given; and shall concurrently provide a copy of this Compliance Agreement to any

successor agency or operator.

VII. FUNDING

A. DOE anticipates that all of its obligations arising under this Agreement will be fully funded annually by the Congress. DOE shall take all necessary steps and use its best efforts to seek timely funding to meet its obligations under this Agreement, EO 12088. The obligations set forth in this Agreement shall be subject to the availability of appropriated funds, and nothing in this Agreement shall be construed to require the obligation or disbursement of any funds in violation of the Anti-Deficiency Act, 31 U.S.C. § 1341 or Limitation on Voluntary Services Act, 31 U.S.C. § 1342. DOE is obligated, however, to seek any additional necessary appropriations where existing funds are unavailable to fulfill the compliance matters identified in this Agreement. Funding proposals will be consistent with the elements of DOE's Waste Management and Environmental Restoration 5-year Plan.

B. The schedules for completion of the activities under this Agreement are subject to negotiation in the event that authorization or appropriation of necessary funds by Congress is not forthcoming.

VIII. FORCE MAJEURE

A. If DOE determines that it will be unable to comply with any of the provisions of this Agreement due to a "force majeure" event, DOE shall promptly notify EPA in writing within ~~ten (10)~~ days of its first knowledge of the delay. DOE shall state the nature, cause, and anticipated length of the delay, and

all steps taken and a schedule for implementation to avoid or minimize a "force majeure" event. If EPA agrees that the event is subject to Force Majeure, time for performance of the provision may be extended for a period of time equal to the length of the delay resulting from the event.

B. For purposes of this Agreement, a "force majeure" event is defined as an event, the circumstances of which are beyond the control of DOE, that could not have been prevented by due diligence, including but not limited to any delay caused solely by EPA or any delay caused by the unavailability of appropriated funds.

C. If the parties do not agree that the delay was caused by a "force majeure" event, or are unable to agree on the extent of delay, this matter shall be resolved pursuant to Section IX of this Agreement. In submitting the matter in accordance with Section IX, DOE shall have the burden of providing that the delay was attributable to a "force majeure" event, that it exercised due diligence in minimizing the delay, and that an extension period of compliance is warranted.

IX. CONFLICT RESOLUTION

In the event of any conflict involving violations of this Agreement, EPA Region VIII and DOE shall meet promptly and shall work in good faith for a period of not less than thirty (30) days in an effort to reach a mutually agreeable resolution of the dispute. If the differences cannot be resolved by the two parties in a timely manner, a proposed Order or Compliance

Agreement may be issued by EPA as appropriate, and the escalation procedures in Section 1-602, 1-603, and 1-604 of Executive Order 12088 shall apply. Additional dispute resolution procedures may also be utilized if mutually agreed by parties.

X. ENFORCEMENT REMEDIES

A. EPA will employ all available enforcement measures should DOE not comply with this Agreement. DOE recognizes its obligations to comply with the Clean Water Act and NPDES Permit Number CO-0001333, issued pursuant to the Act, and will so inform the RFP operator of its duties and obligations.

B. Upon the effective date of this Agreement, and during its term, the parties agree that so long as DOE is in full compliance with the terms of this Agreement, it shall operate in lieu of any administrative, legal and equitable remedies available to EPA against DOE with respect to the activities covered by this Agreement.

C. The provisions of this Agreement, including those related to statutory requirements, regulations, permits, or compliance, are enforceable under citizens suits pursuant to Section 505 of the Act, including actions or suits by the State and its agencies. The parties agree that the State and its political subdivisions are "citizens" within the meaning of Section 505 of the Act.

XI. MODIFICATION OF AGREEMENT

Either party may request a written modification of this Agreement. If approved by both parties, this Agreement shall be amended to incorporate the approved modification.

XII. DURATION OF AGREEMENT

EPA and DOE shall adhere to the terms of this Agreement so long as it remains in effect. This Agreement will continue in effect until superseded by the renewed NPDES permit. It is recognized, however, that the implementation and reporting requirements established herein shall continue.

XIII. EFFECTIVE DATE

This Agreement shall become effective on the date by which all Parties have signed the Agreement.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE

James J. Scherer
Regional Administrator
Region VIII

UNITED STATES DEPARTMENT OF ENERGY

DATE

Robert M. Nelson, Jr.
Manager, Rocky Flats Office
Department of Energy

Attachment A

Table 1
SUMMARY OF VIOLATIONS
U.S. Department of Energy
Rocky Flats Plant
CO-0001333

Parameter	Reporting Period	Permit Limits		Reported Results	
		30-day Ave.	Daily Max.	30-day Ave.	Daily Max.
BOD5 - mg/l		10 a/	25 b/		
	Feb. 1988			11	--
	Mar. 1988			21.3	28.5
	Apr. 1988	--		< 27	< 40
	May. 1988			11	--
		30-day Ave.	7-day Ave.	30-day Ave.	7-day Ave.
Fecal Coliform - No./100ml		200 c/	400 c/		
	Apr. 1988			312	--

- a/ This limitation shall be determined by the arithmetic mean of a minimum of three (3) consecutive samples taken on separate weeks in a 30 day period.
- b/ Any single analysis and/or measurement beyond this limitation shall be considered a violation of the conditions of this permit.
- c/ Averages for Fecal Coliform shall be determined by the geometric mean of a minimum of three (3) consecutive grab samples taken during separate weeks in a 30-day period for the 30-day average, and during separate days in a 7-day period for the 7-day average (minimum total of three (3) samples).

ROCKY FLATS OFFICE
ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT FIVE YEAR PLAN
ACTIVITY DATA SHEET

PAGE 1

CORRECTIVE ACTIVITIES

ADM OPS OFFICE: ROCKY FLATS OFFICE
 INSTALLATION: ROCKY FLATS PLANT
 DATA SHEET NUMBER: 110
 TITLE: AUGMENT SAMPLING AND ANALYSIS OF SURFACE WATERS
 MEDIA: WATER RELEASES
 PROGRAM OFFICE: ENVIRONMENTAL MANAGEMENT
 SPECIAL PROGRAMS:
 NEPA NOT APPLICABLE
 ASSESSMENT/REMEDATION:

PHONE NO : FTS 320-2473
 FACILITY: STP AND HOLDING PONDS
 A106 NO.: 1AIRFP102

DOE CONTACT: MARK VAN DER PUY
 AREA/SITE:
 SPLIT PROJECT:

PRIORITY: 1
 SUB CATEGORY:

LEVEL OF CONFIDENCE: MEDIUM

FUNDING SUMMARY: FISCAL YEAR BUDGET AUTHORITY (IN THOUSANDS)

	1989	1990	1991	1992	1993	1994	1995	1996
	ACTUALS	BUDGET	TARGET	TARGET	REQ.	REQ.	REQ.	REQ.
FUNDING OPERATING	78	500	333	0	0	0	0	0
DIRECT	0	0	0	0	0	0	0	0
INDIRECT	78	500	333	0	0	0	0	0
SUBTOTAL								
EQUIPMENT	0	0	0	0	0	0	0	0
LINE ITEM	0	0	0	0	0	0	0	0
GPP	0	0	0	0	0	0	0	0
GRAND TOTAL	78	500	333	0	0	0	0	0

TOTAL ESTIMATED COST

SCHEDULE 44		SCHEDULE 47		GENERAL PLANT PROJECT	
CODE	TEC	CODE	TEC	CODE	TEC
	0		0		0

NOTE SEE ATTACHMENT FOR APPLICABLE REQUIREMENTS, ENVIRONMENTAL SURVEYS, MILESTONES AND NARRATIVES.

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Report date. 04/04/90, 13.28 10

ROCKY FLATS OFFICE
 ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT FIVE YEAR PLAN
 APPLICABLE REQUIREMENTS
 ADS: 110 AUGMENTED SAMPLING AND ANALYSIS OF SURFACE WATERS

C AGREEMENTS

DESIGNATION
 ATP

TITLE
 DOE/CDM AGREEMENT IN PRINCIPLE

B STATE CODES, LAWS AND REGULATIONS

DESIGNATION
 CWCDC

TITLE
 COLORADO WATER QUALITY CONTROL COMMISSION

ROCKY FLATS OFFICE
ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT FIVE YEAR PLAN
NARRATIVES

15. ACTIVITY DESCRIPTION:

Sampling of effluent water, surface water, and water emanating from groundwater seeps (flowing to holding ponds) is required under the NPDES permit, the AIP, and is necessary to demonstrate compliance with new Colorado WQCC site specific regulations. Because sampling and analysis is required under normal operations and this ADS requires no significant equipment upgrades, funding will be provided under base programs beginning in FY92

This is a new activity, therefore there is no old ADS number.

16. MILESTONE SCHEDULE (by fiscal year):

Perform Monthly Sampling and Analysis 10/89 - 09/96
Perform Periodic Sampling and Analysis Prior to Discharge 10/89 - 09/96

17. FUNDING BASIS (by fiscal year).

	FY89	FY90	FY91	FY92	FY93	FY94	FY95	FY96
FTE	0	1	1					
LABOR\$	0	112	117					
EXP\$	78	388	493					
TOTAL	78	500	610					

Assumptions: 112K/FTE/YR was used for LABORS for FY90 and 117K for FY91. FY91 funding is in FY91 dollars.

New NPDES Permit and subsequent modifications to the DOE/CDH and DOE/EPA agreements do not significantly impact expected sampling frequencies.

18. PRIORITY RATIONALE:

This activity is priority 1 since it is stipulated by a combination of requirements for both DOE/CDH (AIP) and DOE/EPA agreements as they relate to effluent monitoring of surface waters.

19. LEVEL OF CONFIDENCE AND RATIONALE:

The confidence level is medium since only limited cost data has been accumulated. Analytical work is contracted and the cost will vary depending on sample quantities. Limited cost data together with required sampling frequency information allows a reasonable projection of activity costs.

20. ACCOMPLISHMENTS TO DATE:

A complete analysis for organics was performed August 1989 and again in January 1990. Toxicity testing was initiated in January 1990.

21. ACTIVITY ALTERNATIVES:

ROCKY FLATS OFFICE
ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT FIVE YEAR PLAN
NARRATIVES

SHORT RANGE:

None

LONG RANGE:

Alternative biomonitoring technologies for real-time analysis.

ROCKY FLATS OFFICE
ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT FIVE YEAR PLAN
ACTIVITY DATA SHEET

ENVIRONMENTAL RESTORATION

ADH OPS OFFICE: ROCKY FLATS OFFICE
 INSTALLATION: ROCKY FLATS PLANT
 DATA SHEET NUMBER: 1012
 TITLE: SITE WIDE PROGRAMS ASSESSMENT
 MEDIA: CERCLA/RCRA
 PROGRAM OFFICE: ENVIRONMENTAL MANAGEMENT
 SPECIAL PROGRAMS:
 NEPA: NOT APPLICABLE
 ASSESSMENT/REMEDATION: ASSESSMENT

DOE CONTACT: HOWARD ROSE
 AREA/SITE:
 SPLIT PROJECT:
 PHONE NO : FTS 320-7199
 FACILITY: PLANTSITE
 A106 NO : 1ALRFP101
 PRIORITY: 2
 SUB CATEGORY:
 LEVEL OF CONFIDENCE: HIGH

FUNDING SUMMARY: FISCAL YEAR BUDGET AUTHORITY (IN THOUSANDS)

FUNDING OPERATING	NEW B&R EW2010301	OLD B&R GF729101	1989		1990		1991		1992		1993		1994		1995		1996	
			ACTUALS	BUDGET	TARGET	REQ	BUDGET	TARGET	REQ	BUDGET	TARGET	REQ	BUDGET	TARGET	REQ	BUDGET	TARGET	REQ
DIRECT			0	10748	7400	0	12526	7400	0	10552	10576	10024	9895	9934				
INDIRECT			0	0	0	0	0	0	0	0	0	0	0	0				
SUBTOTAL			0	10748	7400	0	12526	7400	0	10552	10576	10024	9895	9934				
EQUIPMENT			0	0	0	0	0	0	0	0	0	0	0	0				
LINE ITEM			0	0	0	0	0	0	0	0	0	0	0	0				
GPP			0	0	0	0	0	0	0	0	0	0	0	0				
GRAND TOTAL			0	10748	7400	0	12526	7400	0	10552	10576	10024	9895	9934				

TOTAL ESTIMATED COST

... SCHEDULE 44 SCHEDULE 47 ...		GENERAL PLANT PROJECT	
CODE	YEC	CODE	YEC	CODE	YEC

NOTE: SEE ATTACHMENT FOR APPLICABLE REQUIREMENTS, ENVIRONMENTAL SURVEYS, MILESTONES AND NARRATIVES

VERSION: 01, 02/22/90 CREATED: 11/15/89 LAST UPDATE: 04/04/90

Report date: 04/04/90, 11:25:15

ROCKY FLATS OFFICE
 ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT FIVE YEAR PLAN
 APPLICABLE REQUIREMENTS
 ADS: 1012 SITE WIDE PROGRAMS ASSESSMENT

A FEDERAL LAWS AND REGULATIONS

DESIGNATION
 CERCLA/SARA

TITLE

COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT OF 1980 / SUPERFUND
 AMENDMENTS AND REAUTHORIZATION ACT OF 1986

C AGREEMENTS

DESIGNATION
 AIP

TITLE

DOE/CDH AGREEMENT IN PRINCIPLE

ROCKY FLATS OFFICE
ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT FIVE YEAR PLAN
NARRATIVES

15. ACTIVITY DESCRIPTION:

This task consists of monitoring the progress of site characterization, closure, and remedial action activities at the Rocky Flats Plant. Work within this activity is a direct result of the IAG and is outside the scope of the normal ER Program Management. Background characterization of surface and groundwater and soils will be obtained along with assessment of contamination at other operating units at the site.

A Community Relations task is included in this activity. This task is outlined in the Federal Facilities Compliance Agreement (FFCA) and requires development of a Community Relations Plan (CRP) describing the technologies and procedures utilized to address concerns and incorporate community involvement.

Other tasks include the development of a Draft Health and Safety Plan documenting specific health and safety procedures, a Draft Plan for the Prevention of Contaminant Dispersion detailing efforts to minimize the potential for windblown dispersion for waste dusts and other harmful materials, a Draft Treatability Study Plan to identify technologies for evaluation in treatability studies program, a Draft Quality Assurance (QA) report in preparation of developing a QA Program, a Sampling and Analysis Plan, Annual Surface Water Monitoring Report, and a Draft Standard Operating Procedures document for the RFP RCRA/CERCLA Program

The original HQ FYP ADSs 1230, 1248, and 1259 were reorganized into ADS 1012 due to the IAG.

16. MILESTONE SCHEDULE (by fiscal year):

Groundwater Monitoring Program	10/88 - 09/00
Surface Water Monitoring Program	10/88 - 09/00
Background Characterization	09/89 - 10/96
Community Relations Plan	09/89 - 10/07
Health & Safety Plan	01/90 - 12/90
QA Program	01/90 - 01/91
Sampling & Analysis Plan	01/90 - 01/91
Discharge Limits for Radionuclides	01/90 - 02/91
Plan for Prevention of Contaminant Dispersion	01/90 - 06/91
Historical Release Report	01/90 - 10/91
Treatability Study Report	01/90 - 01/94
State Response	10/90 - 10/01

17. FUNDING BASIS (by fiscal year):

FTE	FY89	FY90	FY91	FY92	FY93	FY94	FY95	FY96
LABORS	22.3	17.3	13	12.9	12	11.7	11.8	11.8
EXP\$	2503	2027	1599	1587	1476	1440	1452	1452
TOTAL	8245	10547	8953	8989	8548	8455	8482	8482
	10748	12574	10552	10576	10024	9895	9936	9936

ROCKY FLATS OFFICE
ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT FIVE YEAR PLAN
NARRATIVES

Assumptions: All funding is based on using 112K/FTE/YR in FY90 (rounding has occurred), FY91 has been escalated by 4.9%, FY92 by 4.2%, and FY93 and beyond has constant FY92 dollars.

Originally, this activity encompassed the following four activities totalling 7400K: Surface Water Monitoring Program (1,000K), Groundwater Monitoring Program (4,000K), Statistical Analysis of Routine Sampling Results (2,000K), and State Response (400K).

As a result of revisions in the original schedules and estimates, the following changes occurred in FY91 milestones: Groundwater Monitoring Program (1,242K), Background Investigation and Reports (125K), Baseline Wildlife Studies (55K), Monitoring Plan and Annual Monitoring Report (50K), Water Sampling and Analysis Program (600K), Well Development and Maintenance (100K), Surface Water Monitoring Program (1000K), and State Response (400K)

The Agreement in Principle (AIP) impacted the Surface Water Monitoring Program and the Groundwater Monitoring Program. \$110K was needed to comply with the DOE/CDH requirements to collect samples and analysis for proposed discharges and perform periodic biomonitoring in conjunction with CDH and EPA. \$448K was needed to comply to provide improvements to groundwater monitoring systems including 50 additional wells

The Inter-Agency Agreement resulted in further impacts. The following tasks were added as a result: Community Relations Plan (421K), Health & Safety Plan (103K), QA Program (121K), Plan for Prevention of Contaminant Dispersion (255K), Historical Release Report (377K), Treatability Study Report (424K), and Additional Site-Wide Monitoring (1,914K). The FY91 budget increased 4,781K due to the move of Groundwater Monitoring funding into Site Wide activities. This results in a FY91 budget of 12,526K.

18 PRIORITY RATIONALE:

Since this activity is required to meet the terms of the IAG, it has been designated a priority of 2.

19. LEVEL OF CONFIDENCE AND RATIONALE:

Since this is a management activity, there is a high level of confidence associated with the budget estimates.

20. ACCOMPLISHMENTS TO DATE:

The Background Hydrogeochemical Characterization and Monitoring Plan was submitted to EPA and CDH in January 1989, and implementation of the plan began in September 1989. The Background Hydrogeochemical Characterization will be completed in FY90. Sampling and Analysis will continue for subsequent years and a background report will be updated annually. The scope of work, proposals, and contract negotiations are underway for the additional tasks of

ROCKY FLATS OFFICE
ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT FIVE YEAR PLAN
NARRATIVES

the Health & Safety Plan, QA Program, Sampling & Analysis Plan for Prevention of Contaminant Dispersion, Historical Release Report, Treatability Study Plan and Discharge Limits for Radionuclides.

21. ACTIVITY ALTERNATIVES:

SHORT RANGE:

Based on currently negotiated Federal agreements (IAG), there are no available alternatives. Violations to these agreements may result in penalties.

LONG RANGE:

Uncertain, based on future actions.

PAGE: 1

ROCKY FLATS OFFICE
ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT FIVE YEAR PLAN
ACTIVITY DATA SHEET

CORRECTIVE ACTIVITIES

ADM OPS OFFICE: ROCKY FLATS OFFICE DOE CONTACT: MARK VAN DER PUY PHONE NO : FTS 320-2473
 INSTALLATION: ROCKY FLATS PLANT AREA/SITE: FACILITY:
 DATA SHEET NUMBER: 3288 SPLIT PROJECT: A106 NO.: 1ALRFP102

TITLE: SEWAGE TREATMENT PLANT UPGRADE PERMIT REQUIREMENTS

MEDIA: WATER RELEASES PRIORITY: 1 LEVEL OF CONFIDENCE: HIGH
 PROGRAM OFFICE: ENVIRONMENTAL MANAGEMENT SUB CATEGORY:

SPECIAL PROGRAMS:

NEPA. NOT DETERMINED

ASSESSMENT/REMEDICATION:

FUNDING SUMMARY: FISCAL YEAR BUDGET AUTHORITY (IN THOUSANDS)

FUNDING OPERATING	NEW B&R ENT020102 GF730396	OLD B&R GF730396	1989		1990		1991		1992		1993		1994		1995		1996	
			ACTUALS	BUDGET	TARGET	BUDGET	TARGET	BUDGET	TARGET	BUDGET	TARGET	BUDGET	TARGET	BUDGET	TARGET	BUDGET	TARGET	BUDGET
DIRECT			0	112	0	117	0	0	0	0	0	0	0	0	0	0	0	0
INDIRECT			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SUBTOTAL			0	112	0	117	0	0	0	0	0	0	0	0	0	0	0	0
EQUIPMENT	35EW10202	35GF73020	0	620	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LINE ITEM	39EW10202	39GF73020	0	500	0	8200	0	0	0	0	0	0	0	0	0	0	0	0
GPP	39EW10202	39GF73020	0	1000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
GRAND TOTAL			0	2232	0	8317	0	0	0	0	0	0	0	0	0	0	0	0

TOTAL ESTIMATED COST

SCHEDULE 44		SCHEDULE 47		GENERAL PLANT PROJECT	
CODE	TEC	CODE	TEC	CODE	TEC
	8700		0		1000

NOTE: SEE ATTACHMENT FOR APPLICABLE REQUIREMENTS, ENVIRONMENTAL SURVEYS, MILESTONES AND NARRATIVES

VERSION 01, 02/22/90 CREATED: / / LAST UPDATE: 04/11/90

Report date: 04/11/90, 15 13.34

ROCKY FLATS OFFICE
ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT FIVE YEAR PLAN
APPLICABLE REQUIREMENTS
ADS: 3288 SEWAGE TREATMENT PLANT UPGRADE PERMIT REQUIREMENTS

FEDERAL LAWS AND REGULATIONS

A

DESIGNATION

TITLE

FCWA

CLEAR WATER ACT, AS AMENDED BY THE WATER QUALITY ACT OF 1987

ROCKY FLATS OFFICE
ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT FIVE YEAR PLAN
NARRATIVES

15. ACTIVITY DESCRIPTION:

This activity includes the planning, design, and construction phases for upgrading the current sewage treatment plant. This upgrade will bring the plant into compliance with the NPDES Permit. It will involve modification of the current tank arrangement from parallel to series; modification of the drying beds; improvements to the sandfilter heater; construction of eight sampling and buffering tanks; instrumentation and monitor efficiency improvements; and automation of the treatment process for chlorination, de-chlorination, and aeration. All of these efforts are specified in the FFCA (now being finalized) which addresses past NPDES permit violations.

This is a new activity, therefore there is no old ADS number.

16. MILESTONE SCHEDULE (by fiscal year):

New Drying Beds	10/89 - 10/90
Effluent Instrumentation	10/89 - 10/90
Automatic Chlorination/Dechlorination	10/89 - 10/90
Sludge Dryer	10/90 - 10/91
Sand Filters	10/90 - 10/91
Nitrification System	10/91 - 10/92
Inlet Tanks	10/91 - 10/92
Outlet Tanks	10/91 - 10/92

17. FUNDING BASIS (by fiscal year):

	FY89	FY90	FY91	FY92	FY93	FY94	FY95	FY96
FTE		1	1					
LABORS		112	117					
EXP\$		2120	8200					
TOTAL		2232	8317					

Assumptions: 112K/FTE/YR was used for LABORS for FY90 and 117K was used for FY91. FY91 funding is in FY90 dollars escalated by 4.9%.

18. PRIORITY RATIONALE:

This is a FFCA and NPDES permit requirement.

19. LEVEL OF CONFIDENCE AND RATIONALE:

The level of confidence for this task is high. These are engineering budget estimates.

20. ACCOMPLISHMENTS TO DATE:

ROCKY FLATS OFFICE
ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT FIVE YEAR PLAN
NARRATIVES

None.

21. ACTIVITY ALTERNATIVES:

SHORT RANGE:

Violation of law is unacceptable.

LONG RANGE:

None.